

# EXHIBIT X

# FABIAN VANCOTT

Tanner J. Bean  
Attorney  
Tel. 801-323-2266  
tbean@fabianvancott.com

November 19, 2024

**VIA EMAIL & CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Utah County**

**Aaron R. Davidson, Utah County Clerk**

100 E. Center St. Ste 3600

Provo, UT 84606

[claims@utahcounty.gov](mailto:claims@utahcounty.gov)

(801) 851-8109

c/o Legal Counsel, Jeffrey S. Gray

Utah County Attorney's Office

100 E. Center St. Ste 206 HCH

Provo, UT 84606

**Jeffrey S. Gray, Utah County Attorney**

100 E. Center St. Ste 206 HCH

Provo, UT 84606

[claims@utahcounty.gov](mailto:claims@utahcounty.gov)

(801) 851-8026

**Provo City**

**Heidi Allman, City Recorder**

445 W. Center St.

Provo, UT 84601

[recorder@provo.org](mailto:recorder@provo.org)

(801) 852-6524

c/o Legal Counsel, Brian Jones

City Attorney

[bjones@provo.org](mailto:bjones@provo.org)

**Re: Notice of Claim for Constitutional and Statutory Rights on  
Behalf of Bridger Lee Jensen, Singularism, and Psyche Healing and  
Bridging, LLC**

**Dates of Injury:** November 11, 2024 and ongoing to the present

**Location:** Provo, Utah

To Utah County, Provo City, and Mr. Gray:

Pursuant, but not limited, to Utah Code § 63G-7-401 and Utah Code § 63G-33-201(5), Bridger Lee Jensen, Singularism, and Psyche Healing and Bridging, LLC (collectively, "Singularism") hereby provide this notice to (1) Utah County, including the Utah County Attorney's Office, and their various entities, subsidiaries, employees, and agents; (2) Jeffrey S. Gray, Utah County Attorney; (3) Provo City, including the Provo City Police Department, and their various entities, subsidiaries, employees, and agents, including, but not limited to Troy Beebe, Brian Wolken, Jackson Julian, and all other law enforcement officers involved in the events described below, whose names are not yet known, but will be obtained in discovery.

Singularism asserts that Utah Code § 63G-33-201(5) does not apply to require a notice of claim in this instance because the government action described in this notice is ongoing and has placed, and will continue to place, an undue hardship on Singularism or increase the harm suffered by Singularism and is likely to occur or reoccur before the end of the 60-day period described in the statute. Accordingly, Singularism intends to bring, and has brought, an action related to the content of this notice. Singularism also asserts that the violations of federal and state constitutional rights raised by Singularism are exempt from the requirements of the Utah Governmental Immunity Act. However, out of an abundance of caution, Singularism provides this notice.

This letter gives notice of Singularism's claims arising from the treatment of Mr. Jensen; his November 11, 2024 detention; the search conducted of Singularism and Psyche Healing and Bridging's spiritual center of the same day; the seizure of items from that spiritual center of the same day, including psilocybin used for Singularism's sacramental tea in its religious ceremonies; and all subsequent actions taken in relation to these events, including, but not limited to, a November 12, 2024 threat to Singularism's landlord to evict Singularism from its rented space, efforts to bring charges against and prosecute Mr. Jensen or other individuals or entities, forfeiture efforts, and future seizures. All of these events amount to actual, continuing, and expected substantial burdens upon Singularism's religious free exercise protected by the First Amendment to the U.S. Constitution, Article I, Section 4 of the Utah Constitution, and the Utah Religious Freedom Restoration Act. Additionally, these events are violative of the Fourth Amendment to the U.S. Constitution and Article I, Section 14 of the Utah Constitution.

### **BRIEF STATEMENT OF FACTS**

Singularism is a non-profit religious organization entitled to constitutional and statutory protections to the free exercise of its religion. It was established and is led by Bridger Lee Jensen, a sincere religious believer in the spiritual value of entheogenic substances. Psyche Healing and Bridging, LLC, is the for-profit entity associated with

Singularism. Singularism and its followers believe that to access the divine, they must ingest sacramental psilocybin tea. They do so in a private, safe, and controlled environment at Singularism's spiritual center, a rented space located at 1969 N. State St., Provo, Utah 84604. Singularism and its adherents pursue their free exercise of religion according to a their fundamental right to religious free exercise granted by the First Amendment to the U.S. Constitution, Article I, Section 4 of the Utah Constitution, and the Utah Religious Freedom Restoration Act.

Shortly after Singularism announced its religious community to the public, Singularism sent both Provo City and the Utah County Attorney's Office letters informing them of Singularism's existence, its religious practices, its entitlement to religious free exercise, and invited the offices to tour Singularism's spiritual center. The offices declined to do so. Thereafter, until November 11, 2024, Singularism peacefully and safely continued to practice its religion, administering sacramental psilocybin tea to its adherents without any private or public incident or complaint.

On November 11, 2024, Provo City Police Detective Julian and other law enforcement officers served a search warrant upon Mr. Jensen at Singularism's spiritual center. They detained him, questioned him, searched the premises, and seized Singularism's sacramental psilocybin and other items. Before they began, Detective Julian explained that although he understood Mr. Jensen and Singularism's religious claims to be sincere, the Utah County Attorney had instructed him that there does not exist, and cannot exist, any religious exemption from the Utah Controlled Substance Act. When law enforcement departed, they told Mr. Jensen to expect a forthcoming criminal charge. They also recommended Singularism cease all operations. The next day, Provo City Police Captain Wolken served a demand letter on Singularism's landlord threatening that he must evict Singularism, and if he did not do so voluntarily, law enforcement would act against him. On information and belief, Provo City Police Department, in conjunction with Utah County and the Utah County Attorney's Office, have taken and are taking other actions against Singularism and Mr. Jensen which are not yet known.

### **NATURE OF CLAIMS ASSERTED**

Singularism's religious free exercise claims are predicated upon 42 U.S.C. §§ 1983, 1988; the First Amendment to the U.S. Constitution; Article I, Section 4 of the Utah Constitution; and the Utah Religious Freedom Restoration Act. Each indicates the substantial burdens imposed and which will be imposed by the government entities and actors on Singularism's religious free exercise must be reviewed according to strict scrutiny analysis. The entities and actors will be unable to shoulder the burdens under that analysis. No compelling governmental interest exists requiring the denial of a religious exemption to Singularism in particular. And even if one existed, the government entities and actors' actions described above to accomplish that interest are not the least restrictive means by which it could be accomplished.

Because of Singularism's fundamental right to religious free exercise, the Fourth Amendment to the U.S. Constitution and Article I, Section 14 of the Utah Constitution, also protect Singularism from Defendants' unlawful detention of Mr. Jensen and unlawful search and seizure of Singularism's spiritual center and items therein.

Singularism reserves the right to bring any and all other claims that may be discovered through formal discovery. Nothing in this notice shall be construed as an election of remedies.

**DAMAGES INCURRED SO FAR AS KNOWN**

Singularism has incurred significant, ongoing, and expected violations of its fundamental constitutional and statutory rights to free exercise of religion and its rights to be secure in its persons, houses, papers, and effects against unreasonable searches and seizures. It has incurred the loss of its sacramental psilocybin essential to the sincere practice of its religion. Additional actual and compensatory damages are anticipated, including the effects of shutting down a religious organization and the attendant livelihoods of the clergy which depend upon its existence. Attorney fees and costs, recoverable under the authorities described above, also have been incurred in preparation of this notice and the necessary legal action to protect Singularism's religious free exercise. At this time, the exact amount of those damages is not yet known. If Defendants continue to pursue their course of burdening Singularism's religious free exercise, the amount of damages is anticipated to be in excess of \$100,000.

Attached is Singularism's concurrently filed Complaint and Motion for Temporary Restraining Order and Temporary Injunction. I look forward to speaking with your offices about this matter. I can be reached at the email and phone number above.

Sincerely,



Tanner J. Bean  
FABIAN VANCOTT  
*Attorney for Bridger Lee Jensen, Singularism,  
and Psyche Healing and Bridging, LLC*